

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
(Richmond Division)

In re: ) Chapter 11  
 )  
CIRCUIT CITY STORES, INC., *et al.*, ) Case No. 08-35653 (KRH)  
 ) (Jointly Administered)  
 )  
Debtors. ) Honorable Kevin R. Huennekens

**APPLICATION FOR ADMISSION *PRO HAC VICE* OF MARTIN A. KROLEWSKI**

David J. Ervin (the “Movant”), a member in good standing of the bar of the Commonwealth of Virginia, a partner with the law firm of Kelley Drye & Warren LLP and an attorney admitted to practice before this Court, hereby moves this Court for entry of an Order permitting Martin A. Krolewski, an attorney with the law firm of Kelley, Drye & Warren LLP, to appear *pro hac vice* before this Court on behalf of Alfred H. Siegel, Trustee of the Circuit City Stores, Inc. Liquidating Trust (the “Trustee”) pursuant to Local Bankruptcy Rule 2090-1(E)(2).

In support thereof, Movant states as follows:

1. Martin A. Krolewski is a non-resident of the Eastern District of Virginia, is a member in good standing of the bar of the State of New York and the United States District Courts for the Southern and Eastern Districts of New York. There are no disciplinary proceedings pending against Mr. Krolewski.
2. Movant requests that this Court admit Martin A. Krolewski to practice before this Court for the purpose of appearing as counsel in the jointly administered Chapter 11 bankruptcy cases commenced by Circuit City Stores, Inc., et al. (“Debtors”) and certain associated cases related thereto.

3. Pursuant to Local Bankruptcy Rule 9013(G), and because there are no novel issues of law presented in this Application, Movant requests waiver of the requirement that all motions be accompanied by written memoranda of law.

WHEREFORE, Movant respectfully requests that this Court enter an Order substantially in the form annexed hereto permitting Martin A. Krolewski to appear and be heard *pro hac vice* in association with Movant, as counsel to the Trustee, in the Debtors' chapter 11 bankruptcy cases and certain related adversary proceedings and grant such other relief as necessary and appropriate.

Dated: New York, New York  
November 4th, 2010

KELLEY DRYE & WARREN LLP

By: /s/ David J. Ervin  
David J. Ervin (VSB No. 34719)  
Washington Harbour, Suite 400  
3050 K Street, NW  
Washington, DC 20007-5108  
Tel: (202) 342-8436  
Fax: (202) 342-8451

**CERTIFICATE OF SERVICE**

I hereby certify that I have, this 4<sup>th</sup> day of November, 2010 caused the service of a copy of the foregoing Application for Admission *pro hac vice* of Martin A. Krolewski to be sent to those listed below, by first class mail, postage prepaid, at the address designated by them for service of papers and electronically to the parties set forth on the Court's ECF Service List, in this case.

/s/ David J. Ervin  
David J. Ervin

**SERVICE LIST**

Daniel F. Blanks, Esq. Douglas M. Foley, Esq. McGuire Woods LLP 9000 World Trade Center 101 W. Main Street Norfolk, Virginia 23510	Dion W. Hayes, Esq. Joseph S. Sheerin, Esq. Sarah Becket Boehm, Esq. McGuire Woods LLP One James Center 901 East Cary Street Richmond, Virginia 23219
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EASTERN DISTRICT OF VIRGINIA  
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CIRCUIT CITY STORES, INC., *et al.*, ) Case No. 08-35653 (KRH)  
 ) (Jointly Administered)  
 )  
Debtors. )

**ORDER GRANTING ADMISSION *PRO HAC VICE* OF MARTIN A. KROLEWSKI**

Upon consideration of the Application for Admission *pro hac vice* of Martin A. Krolewski filed by David J. Ervin, and it appearing that the Application having been served upon counsel for Circuit City Stores, Inc., *et al.* (collectively, the ‘‘Debtors’’), the Office of the United States Trustee for the Eastern District of Virginia, and after due deliberation and sufficient cause appearing therefor, it is this \_\_\_\_ day of November, 2010, hereby,

**ORDERED**, that pursuant to the requirements of Local Bankruptcy Rule 2090-1(E)(2), Martin A. Krolewski be and is hereby permitted to appear and be heard *pro hac vice* as counsel to Alfred H. Siegel, Trustee of the Circuit City Stores, Inc. Liquidating Trust in the jointly administered Chapter 11 bankruptcy cases commenced by the Debtors and in certain related adversary proceedings.

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We ask for this:

/s/ David J. Ervin  
David J. Ervin (VSB No. 34719)  
KELLEY DRYE & WARREN LLP  
Washington Harbour, Suite 400  
3050 K Street, NW  
Washington, DC 20007-5108  
Tel: (202) 342-8436  
Fax: (202) 342-8451

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Order was served by U.S. Mail, First Class, postage prepaid or electronic means on this the 4th day of November, 2010 to the following constituting all necessary parties:

Daniel F. Blanks  
Douglas M. Foley  
McGuireWoods LLP  
9000 World Trade Center,  
101 W. Main Street  
Norfolk, VA 23510

Dion W. Hayes  
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